

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of:)	
)	CC Docket No. 02-6
Schools and Libraries Universal Service)	
Support Mechanism)	WC Docket No. 13-184

Comments by
California County Superintendents Educational Services Association (CCSESA)
RELATED TO THE E-RATE 2.0 NOTICE OF PROPOSED RULEMAKING

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I. Introduction and Summary

California's 58 County Superintendents of Schools and their respective county offices of education support the financial and academic stability of every district and school in the state.

We appreciate the opportunity to comment on the Notice of Proposed Rulemaking (NPRM), and would like to compliment the FCC on its work and efforts to open the opportunity to improve E-rate to prepare our schools and libraries for the 21st century.

The California County Superintendents Educational Services Association hereafter referred to as (CCSESA) commends the Commission on the comprehensive nature of this Notice. CCSESA will address and offer comments on the program goals of the Notice of Proposed Rule Making (NPRM). We encourage the FCC to remain focused on the fact that E-rate is a successful program and that any changes to the E-rate program should be focused on expanding the program. The current program has been consistently constrained by increasing demand for E-rate-supported services. This increased need illustrates the importance of the program, and its ability to fund 21st century tools for students and teachers. Adequate funding is essential to improving the E-rate program. The single most effective step the FCC can take to bolster the success of the E-rate program is to provide funding in an amount that is sufficient to keep up with current demand and 21st century classroom needs. Any proponent of public education that may not understand this need for additional E-rate funds just needs to be reminded that when the program started in 1997, schools and libraries were using dial-up access. Now, fifteen years later, the program is still funded at that level that was expected to secure dial-up or low speed access in 1997.

We encourage improvement in the following general areas:

II. Increase Funding Level and Modernize E-Rate for 21st Century Educational Needs

Applicants have requested approximately \$5 billion in funding for this past year -- over double what E-rate has available annually for applicants. This is clear evidence that applicants need additional funds. Important school infrastructure for student access is going unfunded. Adequate funding is essential to improving the E-Rate program. The funding cap should be increased to \$4 - \$5 billion in order to meet the current demand for 21st century learning environments.

We consider the following to be definite evidence that the funding level needs to increase:

- applicant requests going unfunded for lack of funds
- information provided in the in the LEADS commission report
- the Xconomy report on United States Internet access speeds--we are ranked 9th in the world¹

Our schools and libraries will use additional funds to ensure our learning environments provide technology tools to educate future generations of citizens who set the pace for our global economy and quality of life.

The many ways that 21st century learning changes classrooms includes using digital tools to personalize learning, online classes, adjusting instruction to meet Common Core State Standards, and administering online, computer-adaptive assessments (SBAC & PARCC).

Given the existing funding demand, and the many needs for increasing classroom technology, the Commission simply must increase the funding available for distribution via the E-rate program.

¹ <http://www.xconomy.com/national/2013/07/23/were-number-9-u-s-slips-in-internet-connection-ranking/>

III. Flexible Infrastructure Options to meet 21st Century Technology Needs

There are questions in the NPRM regarding fiber connectivity options. Fiber is generally the most cost-effective way to deliver high-speed broadband to our schools and libraries. Some schools and libraries might not need fiber now but will in the future. While every applicant's situation will be different, the Commission should continue to support lit and dark fiber options. We support placing dark fiber into the Priority 1 category with lit fiber; this should include modulating electronics, routers, and special construction charges. There is a growing need for infrastructure to support the increased broadband capacity necessary for 21st Century instruction (rich multi-media) and assessment (SBAC and PARCC).

IV. Updating and Streamlining the Application Process

The current application system of processing and approving applications is complex and causes significant delays in funding commitments to schools and libraries. Unnecessary complexity results in:

1. Significant use of consultants, thus a higher cost of getting e-rate funds for applicants
2. Long delays in approvals which results in significant financial stress and challenges for applicants in terms of reliability and timely cash flows for on-going technology support
3. Difficulty receiving definitive instructions when applicants have questions

The current USAC web interface and utilities are outdated, and there is a need for an updated system to give access to view, update and store information. Ideally, applicants just complete a simple, one-page confirmation of services, costs, etc. if applicant is in the second year or greater of a multi-year contract.

We know that groups such as SECA (State E-rate Coordinators Alliance) have provided more specific guidance that will help guide the FCC/USAC in portal changes. We encourage the FCC to bring together a small working group of applicants AFTER the final conclusion is made on E-rate 2.0 changes. This working group could help ensure that changes do not have significant applicant issues, and offer insight on streamlining the process. The working group can be comprised of members from national groups such as SECA or ALA (American Library Association), and from a large and small district/library applicant.

Applicants in our state have pointed out that guidance and assistance can be frustrating. The E-Rate program relies on fall training PowerPoint presentations to guide applicants through a complex system. Instead, there should be a clear, concise application system that makes it easy to complete applications.

Closing

E-rate is a phenomenal program that continues to breathe life into essential technology that is critical and central to education today. That said, the program can be improved to ensure relevancy and ease of access.

There are no definitive instructions regarding the steps to successfully navigate the program. There are guides with regard to completion of specific forms, but there is no centralized document that covers how practices and protocols were developed, nor any guidance on how decisions are made inside the administration.

The entire system needs to be revamped per SECA's proposal to meet current technology and applicant/service provider requirements.

The program should avoid denial-of-funding due to errors in the application process either by the applicant or by staff of the USAC.

The review process must be faster – sometimes it can take months.